

Ministry of Education

**Conseil scolaire de district catholique
du Nouvel-Ontario
Follow-up Report to the Operational
Review**

May 2011

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1. Introduction

The Ministry is in the process of conducting Operational Reviews of the 72 district school boards across the province. The Ministry's goal is to enhance management capacity within school boards by encouraging good stewardship of public resources and by the leveraging and sharing of best practices. By identifying opportunities for continual improvement, school board administration and operations will be aligned to support the government's highest priority: student achievement.

In accordance with the stated objectives of the Operational Reviews, the Ministry has also engaged school boards to participate in a status and implementation update as part of the Operational Review cycle. Occurring approximately 12 months after the issuance of the final Operational Review report, the purpose of the update is to discuss with each school board the progress made in implementing the recommendations contained in the final report. It will also provide school boards with an opportunity to communicate to the Ministry their thoughts on the process, benefits that have been derived, and areas where some adjustments to the process would be beneficial.

As the recommendations vary between school boards, both in terms of quantity and scope, the following criteria were developed to help focus the review team, and the school board, on specific recommendations:

- Is the recommendation linked to the 12 Areas of Opportunity identified in the 2008 Sector Summary Report (seven) and the 2009 Sector Summary Report (five)?
- Does the recommendation represent a move toward more Strategic Planning on the part of Boards?
 - The departments that are responsible for the business functions perform significant activities in support of Student Success. The update should profile whether or not the school board is establishing links between the academic and non-academic functions through its strategic goals and priorities.
- Does the recommendation represent an area of potential risk to the board?
 - As an example, financial systems that are antiquated and require staff with very specialized knowledge could potentially disrupt the operations of the school board should those business skills be lost.
- Is the recommendation deemed to have positive Return on Investment?

- For example, implementation of an attendance management system may have greater potential for savings to the school board than introducing an electronic funds transfer system.
- Does the recommendation reflect updates to the Leading Practices?

For each of the selected recommendations, the school board was asked to provide the following information to the Operational Review team:

- Description of action(s) taken/not taken by the board to address recommendation(s).
- Supporting documentation
- If implemented, describe benefits derived, if possible, and date of implementation.

Details of the prioritization of the recommendations can be found in Appendix A of this report.

The scope of the follow up review also includes high-level consideration of whether the school board demonstrates adoption of those leading practices that were added to the third and fourth editions of the Operational Review Guide. These were not part of the original review process.

2. Status and Implementation Update

Introduction

The Operational Review follow-up for the Conseil scolaire de district catholique du Nouvel-Ontario review took place on January 13, 2011. The Operational Review team conducted a teleconference with the Superintendent of Business Services.

Summary of Recommendation Status

The school board has made significant progress in implementing the recommendations since the completion of its review in April 2009. Of particular note is the development and adoption of new governance policies which not only clearly delineate the division of duties and responsibilities between the trustees and the Director of Education but also defines the governance model of the Board. The school board has also developed a comprehensive multi-year energy management plan that includes measurable consumption reduction goals.

Following the Operational Review report, management presented the report to the board of trustees in June 2009 and communicated a report in May 2010 detailing the actions that management has taken with regards to each recommendation.

There were 32 recommendations made in the original report. The Operational Review team focused on 15 of the recommendations in the follow-up review. Nine of the recommendations selected for follow-up review were from the 12 areas of opportunity identified across the sector in the 2008 and 2009 sector reports, five concerned specific areas of risks and one related to opportunities for return on investment. The selected recommendations and the corresponding criteria are listed in Appendix A.

Overall, the senior administration team has either implemented or has made progress on the majority of the recommendations chosen for follow-up. The only two recommendations the school board has not implemented are the documentation of the annual budget development process and the documentation of the risks linked to the budget. According to management, those two recommendations should be implemented by the beginning of the 2011-12 academic year.

3. Governance and School Board Administration

#1 Establishment of an Effective Governance Model

Operational Review Recommendation	Implementation Update
The school board should clearly define and document the division of duties and responsibilities between the trustees and the Director of Education in order to foster effective working relationships.	Implemented

#1 Establishment of an Effective Governance Model

In the spring of 2010, the Board established a governance committee. The committee, composed of the Director of Education, the President and Vice-President of the Board and three trustees, has developed several new governance policies. Two of those policies clearly document the respective duties and responsibilities of the trustees and the Director of Education. The new governance policies came into effect on November 23, 2010 and are in line with Bill 177. They include a policy which details the governance style of the Board. This represents an additional improvement since the Operational Review report which originally highlighted the lack of definition of a particular model of governance since the board's creation.

With the view to establishing of an effective governance model, it should be noted that trustees and members of the administrative team have also participated to a training called "Authentic Governance" organized by the Association franco-ontarienne des conseils scolaires catholiques (AFOCSC) in February 2010.

4. Human Resource Management and School Staffing/Allocations

#1 Employee Performance Evaluation Processes

Operational Review Recommendation	Implementation Update
The school board should expand its current guidelines on staff performance appraisals so that the appraisal of all school board employee groups, including non-academic staff, is documented. This will ensure consistency and transparency for all school board employees.	In Progress

#2 Attendance Support

Operational Review Recommendation	Implementation Update
The HR department should provide periodic reports on attendance in order to keep the administrative team and trustees informed of the effectiveness of the attendance management process/programs.	In Progress

#3 Management of the School Board's Benefit Plans

Operational Review Recommendation	Implementation Update
The school board should conduct periodic reviews of the insurance carrier (Administrative Services Only) that manages medical and dental claims, in order to ensure that the school board's claims are processed according to the plan's terms and conditions.	In Progress

#1 Employee Performance Evaluation Processes

Management indicated that the Board has developed a formal administrative procedure for Superintendents since receiving the recommendation from the Operational Review.

The Director of Education and the human resource manager are currently working towards ensuring consistency of performance appraisal procedures for all non-teaching staff. In March 2011, a draft performance appraisal procedure for custodial staff (CUPE) will be reviewed by school principals. By March 2011, it is also expected that the draft performance appraisal procedure for department heads and coordinators will be finalized and presented to the Board for adoption. Finally, a third administrative procedure for the performance evaluation all other non-unionized staff is expected to be in place by June 2011 so that all employee groups of the Board will have a performance evaluation process in place by June 2011.

#2 Attendance Support

Management has implemented a software called SEMS (Supply Employee Management System) in February 2010. SEMS is currently used by the school board for reporting absences and automating calls for occasional teachers but it has not been leveraged so far for producing regular reporting. It is expected that regular reporting on absenteeism using SEMS will be presented to the Board on a regular basis starting February 2011.

Management indicated that the school board was waiting before launching the system's reporting function to accumulate a year's worth of data for comparison purposes.

The Director of Education has revised the policies and procedures on absenteeism but those revisions have not yet been published. The formal communication of the school board's revised absenteeism policies and procedures is expected for June 2011.

#3 Management of HR and Payroll Data

The school board does not presently have a process to ensure the school board's medical and dental claims (administrative services only) are audited by a third party. However, management requested and received a report from the school board's insurance carrier of controls used at present and is in the process of determining if the current procedures in place by the board's insurance carrier are adequate. Pending this assessment, the school board will determine what direction should be taken. It was reported that the school board is currently in discussions with the 11 other French school boards to determine whether they should collectively consider hiring an external party to perform an audit of the insurance carrier.

5. Financial Management

#1 Annual Budget Development Process

Operational Review Recommendations	Implementation Update
The finance department should document the annual budget development process in a policy in order to clarify staff roles and responsibilities	Not Implemented

#2 Identification of Risks and Mitigation Strategies

Operational Review Recommendations	Implementation Update
The school board should consider documenting the risks linked to the budget and formally sharing them with members of the executive and finance committees and trustees who are unable to attend meetings	Not Implemented

#3 Interim Financial Reporting Accountability

Operational Review Recommendations	Implementation Update
The finance department should consider modifying the format of interim reports to include accompanying explanatory notes that provide further details about the nature and impact of any variances encountered during the year. The school board should ensure that the board of trustees and the finance committee receive periodic interim reports.	Implemented

#4 Audit

Operational Review Recommendations	Implementation Update
The school board should consider formalizing an internal audit function. This would include a broader audit of financial and management controls. The finance department could start by identifying options for its mandate and scope and the estimated cost for each option.	In Progress
The school board should consider establishing an audit committee to oversee the audit process. The committee's mandate could be to review the audited annual financial statements, the annual appointment of external auditors, the annual audit plan, the recommendation letter and other matters related to the annual audit of the financial statements, the treasurer's quarterly report, and other Board matters. The school board could also consider changing the current mandate of the finance committee to include oversight of the audit process, which would avoid the creation of too many committees.	Implemented

Operational Review Recommendations	Implementation Update
Management and the board of trustees should consider including external advisors to contribute to the effectiveness of the audit committee, or that of the finance committee if its mandate is widened.	Implemented

#5 Procurement Policies and Procedures

Operational Review Recommendations	Implementation Update
The finance department should define purchasing levels of authority that are commensurate with job title/role in its purchasing policy. Once the purchasing levels of authority are established, the department should ensure that they are communicated to staff and should develop a monitoring process for this policy.	Implemented
The finance department should ensure that three-way matching (purchase order, receipt/invoice and inspection) is used for all of the Board's purchases. To increase effectiveness, the finance department should ensure an automated, not manual, three-way matching, where appropriate.	Implemented

#1 Annual Budget Development Process

Management has indicated that a policy documenting the annual budget development process together with a calendar of budgetary activities will be developed in August 2011.

#2 Identification of Risks and Mitigation Strategies

Management has reported that financial risks are currently reported verbally. It is expected that this communication of risks will be formalized in the future with the introduction of notes on major financial risks facing the school board in the financial reporting. In the future, we recommend that the school board formally document the risks that are identified during the budget development process.

#3 Interim Financial Reporting Accountability

Management indicated that it follows the format developed by the Ministry for its interim reporting. Two reports following the Ministry's template have been submitted to the Board in 2009 and 2010. The new reports contain information on staffing and enrolment and include graphical representations which are appreciated by trustees.

#4 Audit

With the release of the 2009-10 Grants for Student Needs (GSN), the Ministry announced funding to establish audit committees and internal audit functions. Since the

initial announcement of this funding, the Ministry has developed a number of audit function supports including a regional audit initiative. The school board is participating in this initiative, which provides funding for some dedicated internal audit staff for the eight regions in the province of Ontario in line with the new Audit Committee Regulation. All of the 12 French-language school boards are a part of the same region.

The Audit Committee Regulation came into effect in September 2010 and requires the establishment of audit committees in school boards by January 31, 2011. The regulation sets out the following major aspects:

- appointment process for members
- requirement for external member participation
- term of appointment
- duties and powers of the committee
- reporting requirements
- deadline for the first audit committee meeting (March 31, 2011)

As part of this initiative, a regional internal audit manager is selected and will submit a summary of the audit plan (current year work schedule and multi-year plan), staffing plan and budget for the following fiscal year to the Director of Education, senior business official and audit committee of the Board.

Management was aware of the new Audit Committee Regulation and a regional internal audit manager has been hired for all 12 French-language school boards in January 2011. The Conseil des écoles catholiques du Centre-Est (CECCE) in Ottawa has been chosen as the host board for all French-language boards. Apart from the manager, the internal audit team will comprise six team members with two team members in Ottawa, two in Toronto and two in Sudbury.

The school board has established an audit committee to oversee the audit process in December 2010. Two external advisors have been identified and will start contributing to the effectiveness of the audit committee starting January 2011.

#5 Procurement Policies and Procedures

Since the Operational Review, management has developed a new procurement administrative procedure which defines purchasing levels of authority that commensurate with job title/role. The new procedure was developed following Supply

Chain Guidelines and was published on January 2011. The procedure has been sent to all staff members with positions that require procurement tasks.

To ensure that a three-way match is used for all of the Board's purchases where appropriate, management has added a section in the procurement procedure which requires staff to use a purchase order for all purchases above \$500. This is another significant improvement since the Operational Review.

6. School Operations and Facilities Management

#1 Standardization of Cleaning and Maintenance Supplies

Operational Review Recommendation	Implementation Update
The custodial and maintenance department should proceed with its plan to implement an inventory system that will enable it to track and control major cleaning and maintenance equipment.	In Progress

#2 Energy Management Plan

Operational Review Recommendation	Implementation Update
The school board should develop a comprehensive multi-year energy management plan that includes consumption reduction goals	Implemented

#3 Development of Annual and Multi-Year Capital Plans

Operational Review Recommendation	Implementation Update
The school board should request that trustees approve a pupil accommodation review policy in order to effectively manage future school closings.	In Progress

#1 Standardization of Cleaning and Maintenance Supplies

The school board has developed an inventory of custodial equipment for each school. The inventory is used to document maintenance and repairs but is currently not used to plan for replacement or for sharing equipment across schools. In the future, the school board plans to formalize the inventory, as it currently exists in paper format, and to leverage it to create a replacement schedule according to the life cycles of the equipment.

#2 Energy Management Plan

Following the Operational Review, the school board has established an Environmental Committee. In 2010, the Environmental Committee developed a policy and administrative procedure on environmental education together with a three-year plan containing measurable energy consumption reduction targets. For example, by June 2013, the school board intends to reduce electricity consumption by four per cent, natural gas by 15 per cent and water by five per cent. The plan mentions the

implementation of a recycling and composting program by 2013 and also describes the actions that will take place in the classroom in support of environmental education.

The three-year plan is complemented by a detailed action plan with regards to the reduction of energy consumption. For each phase Ministry financing, the plan details all the actions that will be taken per school (such as the installation of thermostat, new lighting or motion detection devices, etc.).

#3 Development of Annual and Multi-Year Capital Plans

Since the Operational Review, management has developed a pupil accommodation review policy. Over the upcoming months, the draft policy will be communicated across the Board. It is expected that the policy will be formally adopted by the Board in the summer of 2011.

7. School Board Adoption of New Leading Practices

The following leading practices were added or amended for the Third and Fourth Editions of the Operational Review Guide that were released to the sector. Some of these leading practices are a result of the observations and learning from earlier waves of reviews.

School boards that were reviewed prior to September 2009 were not assessed against the new leading practices identified below. During this follow-up review process, the Operational Review team asked those school boards to comment on the extent to which they demonstrate adoption of these practices.

Governance and School Board Administration

New Leading Practice	Adopted?
The governance model reflects the roles and responsibilities mandated by the Student Achievement and School Board Governance Act, Bill 177.	Yes

The governance policies of the Board comply with the delineation of roles and responsibilities stipulated in the *Student Achievement and School Board Governance Act*, Bill 177.

HR Management and School Staffing/Allocation

New Leading Practice	Adopted?
The school board maintains appropriate process and systems to monitor staff attendance on a timely basis.	Yes
Trustees do not sit on hiring panels (exception hiring the director of education) but provide policies to govern staffing and recruitment.	No
Processes are in place to identify and remove discriminatory biases and systemic barriers in staff recruitment, selection, hiring, mentoring, promotion and succession planning processes. The school board conducts employment system reviews and works towards broadening the diversity of recruitment pools.	Yes
Trustees provide the school board's policy and priority framework within which bargaining takes place.	Yes

With the exception of the second leading practice, management reported that it has already adopted all of the above leading practices. Trustees currently sit on the hiring panels for the following positions: Director of Education, principals and managers.

The Director of Education should review existing practices and the composition of interview panels, and develop formal hiring policies and procedures to clarify the roles

of trustees and school board staff. Trustees should provide strategic policies to govern staffing and recruitment. They should not sit on hiring panels, with the exception of the hiring of the Director of Education.

Financial Management

New Leading Practice	Adopted?
Management ensures adequate controls are in place to safeguard non-grant revenue and coordinate the annual reporting of revenues and expenditures from all sources.	Yes
Approved procurement policies clearly outline circumstances under which the board will use competitive versus non- competitive procurement methods.	Yes
The established policies and procedures that govern all aspects of supply chain management, including both planned (recurring) and unplanned (non-recurring/emergency purchases, comply with the Supply Chain Guideline (SCG) v.1.0	Yes
In line with the SCG, purchasing authorization levels are commensurate to job roles and responsibilities, and are monitored for compliance by a supervisor or department head.	Yes

Management reported that it has already adopted all the above new leading practices.

The Board should review its existing procurement policy to ensure alignment with the BPS Procurement Directive, which has replaced the Supply Chain Guideline 1.0.

Operations and Facilities Management

New Leading Practice	Adopted?
The school board has implemented a formal green clean program as part of its overarching Education Environmental Policy.	Yes
Develop, implement and monitor an occupational health and safety strategy and/or plan that reflects the board's occupational health and safety policies and administrative procedures and ensures the school board is in compliance with associated occupational health and safety statutory requirements.	Yes
Develop, implement and monitor a security strategy and/or plan that reflects the board's security and student safety policies and administrative procedures and ensures the board is in compliance with statutory/policy security requirements.	Yes
Develop, implement and monitor a health strategy and/or plan that reflects the board's health policies and procedures and ensures the school board is in compliance with statutory health requirements.	Yes

New Leading Practice	Adopted?
In constructing, acquiring, operating and managing school facilities, the school board is guided by the principles outlined in the <i>Ontario Green Energy Act, 2009</i> .	Yes
Management gives full consideration to the use of available school space in their local communities before proceeding to build, purchase or lease other spaces.	Yes
The school board has an approved facility partnership policy.	Yes
A Project Manager is appointed to oversee all aspects of the project including monitoring the budget and project timelines and ensuring management processes are in place for issues such as change orders and other internal approvals. This includes periodic project status updates and post-construction project evaluation.	Yes
An independent Cost Consultant is retained by the school board to review the design, provide objective costing analysis and advice, and report to the school board on options to ensure that the proposed capital expenditure is within the approved budget, prior to tendering a project.	No

The school board reported that it has already adopted all of the above leading practices with the exception of the last one which will be put into practice for future capital projects.

Among the leading practices that were adopted, it should be noted that the Board has adopted an environmental policy and administrative procedure in 2010. Management has also developed an annual environmental action plan that contains specific and measurable objectives for the green initiatives of the Board such as the adoption of green clean products.

Appendix A – Selection of Recommendations

- **SP** - Strategic Planning (SP)
- **AR** - Areas of Risk Categories
 - AR 1 - Undue reliance on specific human and / or non-human resources
 - AR 2 - Reputational risk in the community from not acting on the recommendation
 - AR 3 - Financial risk impacting school board’s financial position
- **ROI** - Potential for material Return on Investment
- **TAO** - Twelve Areas of Opportunity from 2008 sector report (seven) and the 2009 sector report (five)
- **NLP** – New leading practices introduced in Wave 4 through the Third Edition of the Operational Review Guide.

Governance and School Board Administration

Ref.	Recommendation	Follow-up Yes/No	Criteria
1.	The school board should clearly define and document the division of duties and responsibilities between the trustees and the Director of Education in order to foster effective working relationships.	Yes	TAO
2.	The school board should complement current operational guidelines and administrative procedures with more strategic policies. This would enable the Board to function more effectively and efficiently by ensuring that the board of trustees does not have to address operational issues. Once the policies are developed, the school board should establish a regular review cycle for policies, administrative guidelines and procedures in order to ensure that they are updated and communicated on a regular basis.	No	

HR Management and School Staffing/Allocation

Ref.	Recommendation	Follow-up Yes/No	Criteria
3.	The HR department's annual plan should be updated, and it should adopt the model used by the custodial, capital or finance departments to ensure that responsibilities can be directly assigned for the actions required for each priority. Performance indicators, timelines and resource requirements would then be compatible with the school board's model.	No	
4.	The school board should expand its current guidelines on staff performance appraisal so that the appraisal of all school board employee groups, including non-academic staff, is documented. This will ensure consistency and transparency for all school board employees.	Yes	TAO
5.	The HR department should provide periodic reports on attendance in order to keep the administrative team and trustees informed of the effectiveness of the attendance management process/programs.	Yes	TAO
6.	The school board should conduct periodic reviews of the insurance carrier (Administrative Services Only) that manages medical and dental claims, in order to ensure that the school board's claims are processed according to the plan's terms and conditions.	Yes	TAO
7.	To gain a better understanding of employee satisfaction, the HR department should regularly conduct confidential staff satisfaction surveys.	No	
8.	The HR department should consider conducting exit interviews with employees who are leaving their positions. Like staff surveys, these interviews will provide input for HR policy and process and program improvement.	No	
9.	The school board should develop a policy governing the annual staff allocation process in order to clarify the roles and responsibilities of staff while making the process more transparent for the trustees.	No	

Financial Management

Ref.	Recommendation	Follow-up Yes/No	Criteria
10.	The finance department should implement processes to ensure compliance with financial guidelines. These processes should include periodic communication of the guidelines to the appropriate	No	

Ref.	Recommendation	Follow-up Yes/No	Criteria
	staff, as well as occasional assessments of staff compliance with the guidelines.		
11.	The finance department should regularly provide scheduled finance policy and procedures awareness, training and skills development educational sessions.	No	
12.	The finance department should document the annual budget development process in a policy in order to clarify staff roles and responsibilities, while making the process more transparent for trustees.	Yes	AR 2
13.	The finance department should ensure that the annual budget presented for approval is clearly linked to the Board-approved goals and priorities, including student achievement targets.	No	
14.	The school board should consider documenting the risks linked to the budget and formally sharing them with members of the executive and finance committees and trustees who are unable to attend meetings, so that they are also aware of the potential risks, the status of risks and proposed mitigation strategies.	Yes	AR 2
15.	The finance department should consider modifying the format of interim reports to include accompanying explanatory notes that provide further details about the nature and impact of any variances encountered during the year. The school board should ensure that the board of trustees and the finance committee receive periodic interim reports.	Yes	TAO
16.	The school board should consider formalizing an internal audit function. This would include a broader audit of financial and management controls. The finance department could start by identifying options for its mandate and scope and the estimated cost for each option.	Yes	TAO
17.	The school board should consider establishing an audit committee to oversee the audit process. The committee's mandate could be to review the audited annual financial statements, the annual appointment of external auditors, the annual audit plan, the recommendation letter and other matters related to the annual audit of the financial statements, the treasurer's quarterly report, and other Board matters. The school board could also consider changing the current mandate of the finance committee to include oversight of the audit process, which would avoid the creation of too many committees.	Yes	TAO
18.	Management and the board of trustees should consider including external advisors to contribute to the effectiveness of the audit committee or that of the finance committee if its mandate is widened.	Yes	TAO

Ref.	Recommendation	Follow-up Yes/No	Criteria
19.	The school board should develop an investment policy in order to reduce its idle cash, in accordance to the Education Act.	No	
20.	The finance department should develop periodic reports on the Board's cash position and the results of future investment activities, and share them with the executive committee and the board of trustees.	Vo	
21.	The finance department should consider using, whenever possible, electronic registration and payment systems for its non-grant revenues exceeding a minimum amount to be determined. For example, management could consider an electronic registration and payment system for its continuing education programs.	No	
22.	The finance department should define purchasing levels of authority that are commensurate with job title/role in its purchasing policy. Once the purchasing levels of authority are established, the department should ensure that they are communicated to staff and should develop a monitoring process for this policy.	Yes	AR 3
23.	The finance department should continue to increase its use of electronic funds transfer (EFT) payments to all appropriate suppliers, to gain greater efficiency and minimize the risk of payments being altered prior to clearing the bank.	No	
24.	The finance department should ensure that three-way matching (purchase order, receipt/invoice and inspection) is used for all of the Board's purchases. To increase effectiveness, the finance department should ensure an automated, not manual, three-way matching, where appropriate.	Yes	AR 3

School Operations and Facilities Management

Ref.	Recommendation	Follow-up Yes/No	Criteria
25.	The custodial and maintenance department and the capital department should implement measures to ensure compliance with operational and facilities management guidelines. These processes should include periodic communication of the guidelines to the appropriate staff, as well as occasional assessments of staff compliance with the guidelines.	No	
26.	The custodial and maintenance department should establish cleaning standards in all its schools to ensure consistent levels of service and monitoring at all sites. Once the standards are established, management should ensure that results are monitored, measured and reported annually	No	

Ref.	Recommendation	Follow-up Yes/No	Criteria
27.	The custodial and maintenance department should proceed with its plan to implement an inventory system that will enable it to track and control major cleaning and maintenance equipment.	Yes	ROI
28.	The school board should develop a comprehensive multi-year energy management plan that includes consumption reduction goals, key activities, timelines for completion, success indicators and assigned responsibilities to complement the school board's energy conservation strategy.	Yes	TAO
29.	Once the Board has created its multi-year energy management plan, the custodial and maintenance department should officially provide formal annual reporting on the conservation savings achieved against the plan.	No	
30.	The custodial and maintenance department should ask the utility companies to provide consolidated billing in an electronic format. This would support more efficient monitoring and forecasting of energy consumption by eliminating the need to manually consolidate billing, as well as reducing the workload of the accounts payable department. Given the geographical area covered by the school board, the Board will likely not be able to consolidate utility billing across all sites. However, management is encouraged to explore opportunities to consolidate utility billing in urban centres such as Sudbury, to increase energy efficiency.	No	
31.	The school board should request that trustees approve a pupil accommodation review policy in order to effectively manage future school closings.	Yes	AR 2
32.	The school board should consider establishing an approved list of professional service providers subject to periodic review.	No	